

May 3, 2022

By ECF

The Hon. Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

USDC SDNY
DOCUMENT
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Re: Iacovacci v. Brevet Holdings, LLC, et al., 18 Civ. 8048

Dear Judge Vyskocil:

The parties write jointly to provide the Court with a Consolidated Exhibit List in Support of Summary Judgment, identifying the exhibits cited in the parties' Rule 56.1 Statement and Counterstatement. That index is attached hereto as Exhibit A. The parties are providing this list solely for ease of reference and do not waive any rights to object to the admissibility of any exhibit.

Certain exhibits on that Consolidated Exhibit List have been designated "Confidential" by one or more parties pursuant to the operative Confidentiality Order in this case (Dkt. 136). Documents designated as "Confidential" pursuant to the Confidentiality Order are identified on the exhibit list with an asterisk. Pursuant to the Court's Individual Practices Rule 9 and the governing Confidentiality Order, the parties write to request approval to file under temporary seal those documents that have been designated "Confidential," and portions of the parties' summary judgment filings and motions to exclude that quote from those documents. The parties make this request in the interest of affording each Disclosing Party the opportunity to file a motion for longer-term sealing within five business days, with opposition papers due three business thereafter. Defendants separately request that the Court grant the parties leave for reply submissions in support of their sealing motions, and Defendants further request that such reply papers, if any, be due two business days after receiving any opposition. Plaintiff does not join Defendants' request for leave for reply submissions, except to request that to the extent leave is granted, it be granted on equal terms to all parties.

Respectfully submitted,

/s/ Jason Cyrilnik

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GRANTED. The parties request for leave to move for longer-term sealing is granted. The parties are also granted leave to file replies. SO ORDERED.

Date: 5/4/2022
New York, New York


Mary Kay Vyskocil
United States District Judge